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Rene Reza, Matthew Rincon, April Wheeler, Jose A. Yamasaki, and
Saul Rodriguez

**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA**

D.S., a minor by and through his)	Case No. 2:23-cv-09412 CBM (AGRx)
guardian <i>ad litem</i> Elsa Acosta,)	Consolidated with Case No. 2:24-cv-
individually and as successor-in-)	04898 CBM (AGR)
interest to William Salgado; C.S., a)	<i>Assigned to:</i>
minor by and through his guardian <i>ad</i>)	District Judge: Consuelo B. Marshall
<i>litem</i> Elsa Acosta, individually and as)	Magistrate Judge: Alicia G. Rosenberg
successor-in-interest to William)	
Salgado; J.S., a minor by and through)	STIPULATION FOR ORDER
her guardian <i>ad litem</i> Elsa Acosta,)	EXTENDING FACT DISCOVERY
individually and as successor-in-)	DEADLINE
interest to William Salgado; M.S., a)	
minor by and through her guardian <i>ad</i>)	
<i>litem</i> Elsa Acosta, individually and as)	
successor-in-interest to William)	
Salgado,)	
)	
Plaintiffs,)	
)	
v.)	
)	
CITY OF HUNTINGTON PARK;)	
NICK NICHOLS; RENE REZA;)	
MATTHEW RINCON; APRIL)	
WHEELER; and DOES 5 through 10,)	
inclusive,)	
)	
Defendants.)	

1 AND CONSOLIDATED ACTION.)
2)
3)

4
5 The Parties in the above-captioned action, through their undersigned counsel,
6 respectfully stipulate and move this Court for an order extending the fact discovery
7 deadline as set forth below:

8 The Parties met and conferred.

9 WHEREAS, on October 10, 2024, the Court issued an Order on Stipulation for
10 Order Extending Discovery and Motion Hearing Deadlines (ECF No. 41), which set
11 forth the following deadlines:

12 **Fact discovery Cut-off is continued to December 16, 2024.**

13 **Initial expert disclosures is continued to January 11, 2025.**

14 **Rebuttal expert disclosure is continued to January 30, 2025.**

15 **Expert discovery Cut-off is continued to February 14, 2025.**

16 **Deadline to Complete Settlement Conference is continued to March 1,**
17 **2025.**

18 **Deadline to Hear Motions is continued to April 1, 2025, at 10:00 a.m.**

19 WHEREAS, the Parties sought one continuance of these deadlines.

20 WHEREAS, on September 3, 2024, the Court ordered that the related cases of
21 *D.S., et al. v. City of Huntington Park, et al.*, No. 2:23-cv-09412-CBM-AGRx, and
22 *William Castillo-Miranda, et al. v. City of Huntington Park, et al.*, No. 2:24-cv-
23 04898-CBM-AGR, were consolidated for purposes of discovery and trial. (ECF No.:
24 38).

25 WHEREAS, on September 17, 2024, Defendants, City of Huntington Park, et
26 al., filed their Answer to Complaint to the related case of *William Castillo-Miranda,*
27 *et al. v. City of Huntington Park, et al.*

28 WHEREAS, on November 27, 2024, Plaintiffs, William Castillo Miranda, et

1 al., served Plaintiffs' Rule 26 Initial Disclosures.

2 WHEREAS, video footage and photographs were produced by Plaintiffs with
3 their Rule 26 Initial Disclosures on November 27, 2024, of potential witnesses to the
4 incident that Defendants did not know existed.

5 WHEREAS, Defendants need additional discovery to determine who this
6 person is.

7 WHEREAS, the Parties believe that a thirty-two (32) day extension of the fact
8 discovery cut-off deadline is necessary and desirable to ensure adequate time for the
9 Parties to conduct further written fact discovery and to take the depositions of the
10 person who took the video footage of the incident and to finish the depositions of
11 Plaintiffs O.C.E, Karla Vanessa Blandon, and Juana Maria Miranda

12 WHEREAS, for the above reasons, good cause exists to extend (1) the fact
13 discovery cut-off date by thirty-two (32) days, or to January 17, 2025.

14 WHEREAS, the Parties agree that if any discovery deadline is extended in
15 accordance with this stipulation such that the new discovery deadline is a Saturday,
16 Sunday, or legal holiday, the deadline will be the preceding day that is not a Saturday,
17 Sunday, or legal holiday.

18 THE PARTIES HEREBY STIPULATE, AGREE AND REQUEST:

19 That the Court modify the following deadlines as follows:

20 Fact Discovery Cut-off be continued to: January 17, 2025

21 All other deadlines contained in the Order and Notice to All Parties (ECF No.:
22 22) and in the Order on Stipulation for Order Extending Discovery and Motion
23 Hearing Deadlines (ECF No. 41) shall remain in full force and effect.
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26
27
28

1 **IT IS SO STIPULATED.**

2 Respectfully submitted,

3
4 DATED: December 10, 2024

**ALVAREZ-GLASMAN & COLVIN
ARNOLD M. ALVAREZ-GLASMAN
CITY ATTORNEY**

5
6
7 /s/ Roger A. Colvin, Esquire

8 Roger A. Colvin

9 Christy M. Garcia

10 Attorneys for Defendants

11 City of Huntington Park, et al.

12
13 DATED: December 10, 2024

LAW OFFICES OF DALE K. GALIPO

14 /s/ Benjamin S. Levine, Esquire

15 Dale K. Galipo

16 Benjamin S. Levine

17 Attorneys for Plaintiffs, D.S., et al.

18 DATED: December 10, 2024

CARRAZCO LAW, A.P.C.

19
20 /s/ Kent M. Henderson, Esquire

21 Angel Carrazco, Jr.

22 Kent M. Henderson

23 Christopher L. Holm

24 Attorneys for Plaintiffs, William Castillo-
Miranda, et al.

25 **Signature Attestation**

26 I, Roger A. Colvin, attest that all signatories listed above, on whose behalf this
27 Stipulation for Order Extending Discovery and Motion Hearing Deadlines is
28 submitted, concur in the filing's content and have authorized the filing.

CERTIFICATE OF SERVICE

I hereby certify that I electronically filed the foregoing with the Clerk of the Court for the Central District of California – by using the CM/ECF system on October 10, 2024.

I hereby certify that all participants in the case are registered CM/ECF users and that service will be accomplished by the CM/ECF system.

Executed on October 10, 2024, at City of Industry, California.

/s/ Melinda Arredondo
Melinda Arredondo